

-----Original Message-----

From: [REDACTED] [mailto:[REDACTED]]
Sent: Wednesday, July 26, 2006 3:13 PM
To: Silawsky, Donald
Subject: Environmental Impact Statement (EIS) for two proposed pipeline crossing

OFFICIAL CORRESPONDENCE VIA ELECTRONIC MAIL
HARD COPY TO FOLLOW

United States Department of Interior

NATIONAL PARK SERVICE
Natchez Trace Parkway
2680 Natchez Trace Parkway
Tupelo, Mississippi 38804

In reply refer to:
L3027(NATR)
xL7617

Donald Silawsky,
Office of Petroleum Reserves (FE-47)
U.S. Department of Energy
1000 Independence Ave., S.W.
Washington, DC 20585

(Donald.silawsky@hq.doe.gov)

Dear Mr. Silawsky:

This is in reference to your letter dated May 19, 2006, concerning a draft Environmental Impact Statement (EIS) for two proposed pipeline crossings of the Natchez Trace Parkway south of Jackson, Mississippi near Milepost 73, and north of Natchez, Mississippi around Milepost 10, and our letter dated June 02, 2006.

In our June 02, 2006 correspondence, we stated that the Natchez Trace Parkway did not have the authority to grant a right-of-way across Parkway land. We requested clarification from our Regional Solicitor of an existing law which we felt could allow us the authority for granting pipeline crossings of the Natchez Trace Parkway. Our Regional Solicitor agrees that we do in fact have the authority to issue right-of-ways for new pipeline crossings of the Parkway.

Because of this change in our position, we now respectfully submit our request to be a cooperating agency on your proposed EIS for the proposed petroleum pipeline crossings of the Natchez Trace Parkway. A detailed section in the proposed EIS which describes the impacts to the Parkway including mapping is requested so that it will suffice for National Park Service (NPS) National Environmental Policy Act (NEPA) compliance to be attached to the right-of-way applications. A Statement of Findings will also be required if the proposed construction impacts any wetlands on Parkway land. Archeological clearance and the Section 106 of the National Historic Preservation Act

compliance process will also be required regardless of which alternative you propose on Park lands. Please be aware that the entire areas under consideration for your construction activities could be archeologically sensitive and could require extensive mitigation as well.

In general, rights-of-way and easements represent tools for managing and controlling access to, use of, and interest in National Park Service land in order to preserve limited park resources. It is the responsibility of the park Superintendent to see that these interests are granted or acquired in a way that will not cause the derogation of values and purposes for which the park was established. It is important to note that although park resource management professionals serve as key support to the Superintendent in evaluating right-of-way proposals, only the Southeast Regional Director of the National Park Service has approval authority for granting rights-of-way for the Parkway. Right-of-ways are not given freely and are scrutinized very closely by the National Park Service. Moreover, the NPS has a Congressional mandate to manage NPS lands in a manner that will not result in derogation of the values and purposes for which the park was established. As one of the four nationally recognized rural parkways, the Natchez Trace Parkway, in its entirety, is eligible for the National Register of Historic Places as a designed cultural landscape and as a tribute to Landscape Architectural design and road way engineering partnerships at their best.

As we stated in our June 02, 2006 correspondence, based on your description of the proposed pipeline alignments, it would appear that the crossing near Milepost 73 is being routed directly through the historic Dillon Plantation, which is eligible for the National Register of Historic Places. Approximately 500 feet of Old Trace, listed on the National Register of Historic Places, is interpreted within the present boundary of the Parkway at Dean's Stand near Milepost 73.

The crossing near Natchez, Mississippi appears that it could adversely impact Emerald Mound or Mount Locust and it would likely adversely impact segments of the historic Old Trace that runs throughout this section, all listed on the National Register of Historic Places.

We hope the information we have provided is sufficient to answer your concerns regarding the proposed development affecting the Parkway. Should you require additional information, please feel free to contact D. Craig Stubblefield, Chief of Resource Management, at [REDACTED].

Sincerely,

/s/
Stennis R. Young
Acting Superintendent

RM/Drafts/Correspondence 2006/Strategic Reserve Pipelines
CS:tb:7/26/06

bcc: Central, Read,, RM, Chief RM